

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

UNITED STATES OF AMERICA) INFORMATION NO.
)
 v.) 18 U.S.C. § 1343
) Wire Fraud
 WILLIAM HAROLD RICHARDS)

CR 224 004

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this Information:

GENERAL ALLEGATIONS

1. Glynn County Public Works ("GCPW") is the department responsible for maintaining the roads, drainage structures, traffic control devices, vehicles and equipment, and solid waste services in Glynn County, Georgia, within the Southern District of Georgia.

2. Defendant WILLIAM HAROLD RICHARDS was employed as a supervisor at GCPW. As part of his official duties, he was responsible for reconciling and coding purchases made with department purchase cards. His official duties required access to employee purchase cards and department billing permissions.

3. As described herein, from approximately June 2021 until September 2023, Defendant WILLIAM HAROLD RICHARDS did fraudulently and without legal authority obtain hundreds of thousands of dollars from GCPW by means of false and fraudulent pretenses, representations, and promises. He then did use that money for his own personal use and benefit.

COUNT ONE

Wire Fraud

18 U.S.C. § 1343

4. Paragraphs 1 through 3 of this Information are incorporated as if fully set forth herein.

5. From at least in or around June 2021 until September 2023, in Glynn County, within the Southern District of Georgia, and elsewhere, the Defendant, **WILLIAM HAROLD RICHARDS**, knowingly executed and attempted to execute a scheme and artifice to defraud Glynn County Public Works ("GCPW") to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

THE SCHEME AND ARTIFICE

6. It was part of the scheme and artifice that Defendant **WILLIAM HAROLD RICHARDS** would and did use his position as a GCPW employee to access employee purchase cards and department billing permissions.

7. It was further part of the scheme that **WILLIAM HAROLD RICHARDS** would and did fraudulently charge his own employee purchase card and cards belonging to other employees.

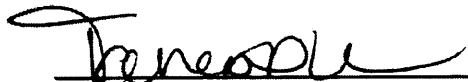
8. It was further part of the scheme that **WILLIAM HAROLD RICHARDS** would and did create a fictitious entity to conceal his fraudulent billings to GCPW employee purchase cards. The fictitious entity was associated with an account controlled by Defendant on the Square platform, a business technology platform often used to accept and process payments from customers.

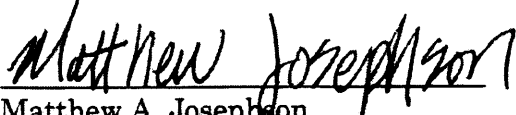
9. It was further part of the scheme that **WILLIAM HAROLD RICHARDS** would and did transfer money from his fictitious Square account through interstate wires to his personal bank accounts.

10. It was a purpose of the scheme for **WILLIAM HAROLD RICHARDS** to enrich himself by obtaining money and property belonging to GCPW for his own use and benefit. Defendant used the proceeds of his fraudulent scheme to make numerous personal purchases, including the purchase of lottery tickets.

THE EXECUTION OF THE SCHEME

11. On or about September 5, 2023, in the Southern District of Georgia, and elsewhere, Defendant **WILLIAM HAROLD RICHARDS**, for the purpose of executing the scheme and artifice described above, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals, and sounds: that is, Defendant **WILLIAM HAROLD RICHARDS** caused to be transmitted an electronic payment through the payment service Square, located in California, to his personal bank account located in Texas, with withdrawals of fraudulent proceeds taking place within Georgia, all by means of interstate wire communication. All in violation of Title 18, United States Code, Section 1343.


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